

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

ZHU ZHAI HOLDINGS LIMITED)	
AND PETER PUI TAK LEE,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 1:20-CV-04985
)	
STEVEN IVANKOVICH,)	
)	
Defendant.)	

**THE LLCS' RESPONSE TO
SPECIAL MASTER'S ORDER NO. 9**

NOW COMES Pilgrim Warwick LLC; Pilgrim Coulter LLC; Pilgrim Windtree LLC; Pilgrim Caribbean Isle LLC; Pilgrim Forest Park LLC (collectively the “Pilgrim LLCs,” each a “Pilgrim LLC”); Alliance HTFL LLC, (together with the Pilgrim LLCs, the “LLCs”); by and through their attorneys, Chuhak & Tecson, P.C., for their Response to Special Master’s Order No. 9 (Doc. 324). In support of this Response, the LLCs state as follows:

1. On August 5, 2024, Honorable Judge Schenkier, Special Master, entered his Special Master Order No. 9 ordering that the Third Party LLCs and Defendant Steven Ivankovich provide the EIN numbers for the entities listed in Plaintiffs August 2, 2024, letter or provide compelling reason why they should not be required to do so by August 9, 2024. *See* Doc. 324.

2. After continued diligent search by the LLCs asset management vice president, Shanna Willis, the EINS for the following twenty-one entities were located and are attached hereto as **Exhibit A**:

- a. Alliance Holdings Investments, LLC
- b. Alliance HTFL LP, LLC
- c. Alliance HTTX LP, LLC

- d. Atlas Apartments Acquisition
- e. Atlas Apartments Development
- f. Atlas Apartment Homes
- g. Atlas Brookview Managing Member
- h. Atlas Exchange Court
- i. Atlas Holdings Investments
- j. Atlas Media City
- k. Atlas Media City, LLC
- l. Atlas MF Holdco
- m. Atlas MF Mezz Borrower
- n. Atlas Multifamily Three
- o. Atlas Longfellow Arms
- p. A & O Family LLC
- q. Atlas Legends of El Paso
- r. Atlas Mariposa Villas
- s. Atlas River Oaks
- t. Atlas Stone Bridge at City Park
- u. Glencoe Family Dwelling LLC

3. No further EINs were located after a diligent search.

4. Also attached hereto as **Exhibit B** is the previously produced list of accounts for each of the limited liability companies that lists each limited liability company by name, with the name of their bank, the account numbers, and ABA numbers for each bank.

5. Exhibit B includes bank information for the limited liability companies referenced in Plaintiffs' August 2, 2024, letter.

6. Bearing in mind that the Special Master's Order No. 1, dated March 19, 2024, required the Defendant and Third Party LLCs to provide information to serve subpoenas on all entities for which defendant "has the ability to transfer funds," the Plaintiffs has such information (and has had that information for some time) considering it has each named limited liability company with account numbers as to their respective banks.

7. Accordingly, Plaintiffs may issue subpoenas to each of the identified banks with the name of the limited liability company and full account number.

8. Such identifying information should be sufficient and, in undersigned Counsel's' combined decades' experience in financial services litigation, is more information than many subpoenaing parties customarily have when issuing subpoenas to banks for a customer's financial records.

9. That Plaintiffs have sufficient information is underscored by the undisputed fact that Jeanette Ivankovich has received countless documents responsive to subpoenas she issued as to the various limited liability companies, with or without the EINs.

10. In that light, if a bank responds that it cannot identify responsive documents with the name of the account holder and full account number, and that it can only identify such documents if it has the EIN for that specific entity, then the parties should address the bank's response at that time.

11. Of note, Plaintiffs do not claim that have insufficient information to subpoena (or otherwise don't already possess documents) related to the PILGRIM LLCs to litigate the release or turnover of the LLCs' funds deposited by Walker & Dunlop.

Respectfully submitted,

Pilgrim Warwick LLC, Pilgrim Coulter LLC,
Pilgrim Windtree LLC, Pilgrim Caribbean Isle LLC,
Pilgrim Forrest Park LLC, and Alliance HTFL LLC,

/s/ C. Cy Porras
By: One of Its Attorneys

Michael Debre (IL Bar No. 6296197)
C. Cy Porras (IL Bar No. 6324512)
CHUHAK & TECSON, P.C.
120 S. Riverside Plaza, Suite 1700
Chicago, IL 60606
(312) 844-4313
mdebre@chuhak.com
cporras@chuhak.com

EXHIBIT A
INCORPORATED
BY REFERENCE
ONLY

The Exhibit is uploaded
to JAMS and will be
Transmitted by
Separate Service

EXHIBIT B
INCORPORATED
BY REFERENCE
ONLY

The Exhibit is
uploaded to JAMS and
will be
Transmitted by
Separate Service